

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMAX, INC. and WORKTOOLS, INC.,

Plaintiffs,

JURY TRIAL DEMANDED

v.

ACCO BRANDS CORP.,

Defendant.

Civil Action No. 1:16-cv-10695-NMG

**DEFENDANT'S MOTION TO TRANSFER VENUE
TO THE NORTHERN DISTRICT OF ILLINOIS**

Pursuant to 28 U.S.C. 1404(a), Defendant ACCO Brands Corp. ("ACCO Brands") respectfully requests that the Court transfer this case to the Northern District of Illinois. As set forth more fully in Defendant's Opening Brief and the Declarations of Jesse Fisher and Chad Stover, which are filed herewith, nothing connects this forum to this dispute; Plaintiffs have admitted that this is an inconvenient and unduly expensive forum in which to enforce the asserted patents; and the vast majority of the evidence and witnesses relevant to this dispute are located near Chicago, Illinois.

Accordingly, this action should be transferred to the Northern District of Illinois.

Where plaintiffs sue in a forum in which defendant is subject to jurisdiction, there is a strong presumption in favor of plaintiffs' choice of forum.
Coady v. Ashcroft and Gerel, 223 F.3d 1, 11 (1st Cir, 2000). That presumption has not been overcome in this case.
Motion denied. SBN/Gorton, USDI 10/4/16